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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

E.T.I. EURO TELECOM INTERNATIONAL N.V.,

Plaintiff,

-against-

**REPUBLIC OF BOLIVIA and
EMPRESA NACIONAL DE
TELECOMUNICACIONES ENTEL S.A.,**

Defendants.

CIVIL ACTION NO.: 08-CV-4247 (LTS)

NOTICE OF MOTION

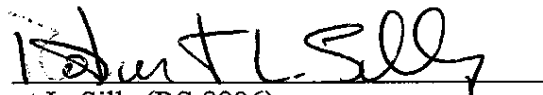
PLEASE TAKE NOTICE that, upon the accompanying Memorandum and all prior pleadings and proceedings herein, Plaintiff E.T.I. Euro Telecom International N.V. ("ETI") will move this Court, before the Hon. Laura T. Swain, United States District Judge, at the Daniel Patrick Moynihan United States Courthouse, Courtroom 17C, 500 Pearl Street, New York, New York 10007, at a date and time convenient for the Court, for an Order, pursuant to Federal Rule of Civil Procedure 59 and Rule 6.3 of the Court's Local Civil Rules: (1) reconsidering the Court's Memorandum Opinion and Order dated July 30, 2008 (the "July 30 Order") and, upon reconsideration, confirming the Court's May 5, 2008 order of attachment; (2) staying the July 30 Order pending a determination of ETI's motion for reconsideration; or, in the alternative (3) dismissing this action to permit ETI to pursue an appeal, and granting ETI a stay pending appeal.

PLEASE TAKE FURTHER NOTICE that, counsel to ETI has, in compliance with Rule 2B of the Court's Individual Practices, conferred with counsel to Defendants, using its best efforts to resolve informally the matters raised in this motion, but no such resolution was reached.

PLEASE TAKE FURTHER NOTICE that, pursuant to Local Civil Rule 6.1(b), any answering memoranda shall be served within ten business days after service hereof and Plaintiff's reply papers in support of its motion shall be served within five business days after service of the answering papers.

Dated: New York, New York
August 1, 2008

ORRICK, HERRINGTON & SUTCLIFFE LLP

By: 

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